

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GARRY R. BARNES AND GLB VENTURE, LLC,)	
)	Case No. 08-162
)	
Plaintiffs,)	Hon. Ronald Guzman
)	
v.)	
)	
NEUROMARK, INC.,)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR DEFAULT

Plaintiffs, Garry R. Barnes and GLB Venture, LLC, request that this Court enter an order finding Defendant, Neuromark, Inc., in default for failure to comply with the Local Rules and awarding judgment to the Plaintiffs, and, in support respectfully state as follows:

1. This case was filed on January 11, 2008.
2. Local Rule 3.2 provides that, "A party must file its [corporate disclosure] statement with the complaint or answer, or upon filing a motion, response, or petition, whichever occurs first."
3. Defendant filed its Answer on February 25, 2008.
4. As of the date of the filing of this Motion, Defendant has not filed its LR3.2 disclosures.

5. Local Rule 10.1 provides that, “Responsive pleadings shall be made in numbered paragraphs each corresponding to and stating a concise summary of the paragraph to which it is directed.”

6. Not one of Defendant’s answers states a summary of the paragraph in the Complaint to which it is directed. A copy of the Answer is attached as **Exhibit A.**

7. On July 8, Plaintiffs’ counsel wrote to Defendant’s counsel pointing out these deficiencies. A t copy of the July 8 letter is attached as **Exhibit B.**

8. As of the date of the filing of the Motion, Defendant has neither corrected its deficiencies nor responded to the Plaintiffs’ letter.

WHEREFORE, Plaintiffs request that this court enter an order:

- A. Finding Defendant in default;
- B. Awarding judgment to Plaintiffs;
- C. Ordering Defendant to pay Plaintiffs’ fees for drafting and bringing this Motion; and,

D. Awarding Plaintiffs such other and further relief as is just and equitable.

Date: July 21, 2008

Respectfully submitted,

By: /s/ Jessica Tovrov
One of the Plaintiffs' Attorneys

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